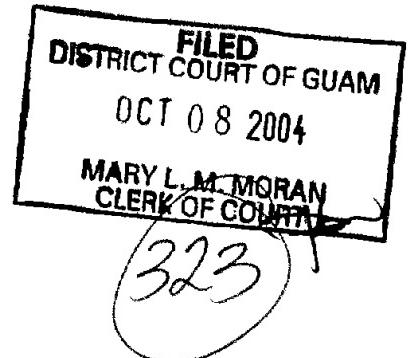


JACQUES G. BRONZE
LAW OFFICES OF BRONZE & TANG, P.C.
BankPacific Building, Suite 201
825 South Marine Drive
Tumuning, Guam 96913
Telephone No.: (671) 646-2001
Facsimile No.: (671) 647-7671

RICHARD A. PIPES
LAW OFFICES OF RICHARD A. PIPES
BankPacific Building, Suite 201
825 South Marine Drive
Tumuning, Guam 96913
Telephone No.: (671) 646-2001



Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S)	
INC., a Guam corporation,)	
)	
Plaintiffs,)	MOTION FOR PROTECTIVE
)	ORDER [FRCP 26(c)]
v.)	
)	
HONGKONG AND SHANGHAI)	
BANKING CORPORATION, LTD.,)	
et al.,)	
Defendants.)	
_____)	

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagåtña, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order

striking the deposition notices issued by Plaintiffs to conduct the depositions in Guam of Magnus Montan and Christopher Page, as more fully explained in the Memorandum of Points and Authorities contemporaneously filed herein.

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 8 day of October, 2004.

LAW OFFICES OF BRONZE & TANG
Attorneys for Defendant The Hongkong and Shanghai
Banking Corporation Ltd.

By:

JACQUES G. BRONZE

RAP/nsh